

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

TIMOTHY P. PETTY,	)	
	)	
Plaintiff,	)	07 C 7013
	)	
v.	)	Judge Andersen
	)	
THE CITY OF CHICAGO, et al.	)	Magistrate Judge Denlow
	)	
Defendants.	)	
	)	

**DEFENDANTS' AGREED MOTION FOR AN EXTENSION OF TIME TO ANSWER  
OR OTHERWISE PLEAD TO PLAINTIFF'S THIRD AMENDED COMPLAINT**

Defendant City of Chicago (the "City"), by its attorney, Mara S. Georges, Corporation Counsel for the City of Chicago, and by Margaret A. Carey, attorney for Defendants Michael Conway, Mark Regal, Gregory Danz, William Davis, Harry Fenner, Joseph O'Carroll, Allen Lee, Jamie Kane, J. Weitzman, and Elizabeth Dawson ("Defendants"), move for an extension of time up to and including May 23, 2008, to answer or otherwise plead to plaintiff's Third Amended Complaint. In support of this motion, the Defendants state as follows:

1. On December 13, 2007, the City removed this action to Federal Court.
2. Plaintiff filed their Third Amended Complaint on March 7, 2008.

Defendants' answer or other responsive pleading is due by April 25, 2008.

3. Counsel for Defendants are in the process of determining whether the defense in this case will be referred to outside counsel.

4. Outside counsel will need time to familiarize themselves with the above-captioned matter, consult with the Defendants, and prepare answers or other responsive pleadings.

5. In the event Defendants do not refer the above-captioned matter to outside counsel, City attorneys will need additional time to prepare their responses to the complaint.

6. Therefore, counsel for Defendants request an extension of time to May 23, 2008, to answer or otherwise plead to plaintiff's Third Amended Complaint.

7. Counsel for the City spoke to plaintiff's counsel on April 25, 2008, and plaintiff has no objection to this motion.

8. This motion is the City's second request for an extension of time to answer or otherwise plead. However, this is the City's first request for an extension of time to answer or otherwise plead to plaintiff's Third Amended Complaint. This request is not made for the purpose of delay or for any other improper purpose.

WHEREFORE, Defendants respectfully requests that this Court grant them an extension of time up to and including May 23, 2008, to answer or otherwise plead to plaintiff's Third Amended Complaint.

Respectfully submitted,

MARA S. GEORGES  
CORPORATION COUNSEL

BY: /s/ Helen C. Gibbons  
HELEN C. GIBBONS  
Assistant Corporation Counsel

/s/ Margaret A. Carey  
MARGARET A. CAREY  
Senior Counsel

City of Chicago, Department of Law  
30 North LaSalle Street, Suite 1020  
Chicago, Illinois 60602  
(312) 742-3541 Phone  
(312) 744-3989 Fax  
Attorney No. 6292881

City of Chicago, Department of Law  
30 North LaSalle Street, Suite 1400  
Chicago, Illinois 60602  
(312) 744-6073  
(312) 744-6566  
Attorney No. 6206693

**CERTIFICATE OF SERVICE**

I hereby certify that I have caused true and correct copies of the above and foregoing Motion and Notice of Motion to be served upon all parties of record pursuant to ECF, in accordance with the rules of electronic filing of documents, on this 25th day of April, 2008.

/s/ Helen C. Gibbons  
HELEN C. GIBBONS